

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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**IN RE TERRORIST ATTACKS ON
SEPTEMBER 11, 2001**

**Civil Action No.
03 MDL 1570 (RCC)**

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This document relates to:

Thomas E. Burnett, Sr., et al. vs. Al Baraka Investment and Development Corp., et al.,
Case No. 03-CV-9849 (GBD)(SN) (S.D.N.Y.)

**MOTION TO SUBSTITUTE PARTIES PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE 15(d)**

Pursuant to Federal Rules of Civil Procedure 15(d), Plaintiffs herein move the Court to allow substitution of the parties as identified on Exhibit A in the above referenced action. The individuals being substituted into the case were minors at the time that the case was initially instituted; were identified as such in the initial pleading; and have since attained the age of majority. They have executed contracts with counsel in their individual capacities and now seek inclusion in the caption of the case in their individual capacities.

Exhibit A identifies each of the former minor plaintiffs to be substituted in the pleading including the capacity in which they seek to be substituted; states each plaintiffs' residency at the time the complaint was instituted; identifies location in the existing pleading and the existing text that makes reference to each plaintiff; and identifies the decedent who was the parent of each plaintiff.

Plaintiffs submit that filing this motion for substitution on behalf of a larger group of individuals rather than filing individualized, piecemeal, motions serves to support efficiency. Further, Plaintiffs propose that, upon endorsement of Plaintiffs' Proposed Order, each substituted party would be individually entered as a Plaintiff into the Court's ECF system to ease the burden on the Clerk of the Court's Office and the size of this MDL.

Dated: December 31, 2018

Respectfully submitted,

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